

REMARKS/ARGUMENTS

These remarks are made in response to the Office Action of June 17, 2008 (Office Action). As this response is timely filed within the 3-month shortened statutory period, no fee is believed due. However, the Examiner is expressly authorized to charge any deficiencies to Deposit Account No. 50-0951.

Claims Rejections – 35 USC § 103

Claims 1-6, 8, 10-11, and 13-19 were rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Published Patent Application 2004/0003041 to Moore, *et al.* (hereinafter Moore) in view of U.S. Patent 7,103,644 to Zhang, *et al.* (hereinafter Zhang).

Although Applicants respectfully disagree with the rejections, Applicants have amended Claims 1 and 2. Applicants have cancelled Claims 7-19. However, Applicants are not conceding that the remaining claims as originally formulated or the cancelled claims fail to present patentable subject matter. The amendments and cancellation are solely for the purpose of expediting prosecution. Accordingly, neither the amendments nor cancellations should be interpreted as the surrender of any subject matter, and Applicants expressly reserve the right to present the original version of any of the amended claims in any future divisional or continuation applications from the present application.

As discussed herein, the claim amendments are fully supported throughout the Specification. No new matter has been introduced by the claim amendments.

Aspects of Applicants' Invention

It may be helpful to reiterate certain aspects of Applicants' invention prior to addressing the cited references. One embodiment of the invention, as typified by amended Claim 1, is a method for bridging a teleconferencing system and an instant messaging system.

The method can include providing a device serving as a bridge between the teleconferencing system and the messaging system. The device can be directly coupled between the teleconferencing system and the instant messaging system or coupled between the teleconferencing system and the instant messaging system via a data network. The device can be configured to convert a speech input into a text message or a text message into a speech output.

The method also can include receiving at the device a speech input received by the teleconferencing system from a telephone connected to the teleconferencing system; transcribing the speech input to a first text message by the device; and transmitting the first text message to a plurality of instant messaging devices participating in an instant messaging based conference managed by the instant messaging system.

The method further can include receiving at the device a second text message from any one among the plurality of instant messaging devices participating in the instant messaging based conference; converting the second text message to a speech output; and transmitting the speech output to a plurality of telephones participating in a teleconference managed by the teleconferencing system.

See, e.g., Specification, paragraphs [0013]-[0018]; see also Figs. 1 and 2.

The Claims Define Over The Prior Art

It was asserted at page 10 of the Office Action that since Moore expressly says that the intelligent chat gateway 52 manages messaging communications among a plurality of parties, the intelligent chat gateway 52 is functionally equivalent to a teleconferencing system. However, it is noted that managing messaging communications among a plurality of parties is the function of an instant messaging (IM) system, not a teleconferencing system which manages voice communications among telephone users. In fact, the subject matter of Moore is a messaging response system that can manage

messaging communications among a plurality of parties using different means (such as a computer, a VoIP phone, or a conventional phone) to access the system.

Although Moore discloses that an IP telephone 92 and a conventional telephone 62 can access the messaging response system, Moore does not disclose a system that bridges the gap between the existing voice conferencing and IM systems, which is a particular component of the present invention. In the present invention, the phones 26, 28 are not directly connected to the IM system 22, but rather are connected to the teleconferencing system 24, which in turn is connected to the IM system 22 through the device 12 that serves as a bridge between the teleconferencing system 24 and the IM system 22 (see Fig. 1; see also Specification, paragraph [0014]).

It was also asserted on page 10 of the Office Action that Moore states that the service provider system 30 may include, without limitation, conference call establishment (paragraph [0087]). However, it is noted that the Examiner has already asserted above that the intelligent chat gateway 52 is functionally equivalent to a teleconferencing system. It is thus not clear which element is considered by the Examiner as the teleconferencing system. As can be seen in Fig. 1 of Moore, the service provider 30 is directly coupled to the intelligent chat gateway 52. Therefore, the service provider 30 and the intelligent chat gateway 52 may be considered as one system. If, as is logically implied, the Examiner considered the service provider 30 and the intelligent chat gateway 52 together as the teleconferencing system, then Fig. 1 of Moore does not show a separate IM system or IM service provider. In any case, Moore does not show two separate systems, a teleconferencing system and an IM system, that are bridged by the device 12 as shown in Fig. 1 of the instant application.

Zhang discloses a system for converged service creation and execution in which a converged service creation and execution environment messaging bus is in communication with a service session manager logic, and a plurality of service servers

are in communication with the converged service creation and execution environment messaging bus. However, Zhang also does not disclose the concept of bridging the gap between an existing voice conferencing system and an existing IM system according to the present invention. In Zhang, the plurality of service servers are all connected to the same messaging bus and thus form a single service provider system.

Accordingly, the cited references, alone or in combination, fail to disclose or suggest each and every element of Claim 1, as amended. Applicants therefore respectfully submit that amended Claim 1 defines over the prior art. Furthermore, as each of the remaining claims depends from Claim 1 while reciting additional features, Applicants further respectfully submit that the remaining claims likewise define over the prior art.

Applicants thus respectfully request that the claim rejections under 35 U.S.C. § 103 be withdrawn.

CONCLUSION

Applicants believe that this application is now in full condition for allowance, which action is respectfully requested. Applicants request that the Examiner call the undersigned if clarification is needed on any matter within this Amendment, or if the Examiner believes a telephone interview would expedite the prosecution of the subject application to completion.

Respectfully submitted,
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